



1990 South Bundy Drive, Suite 705
Los Angeles, CA 90025
P 310.826.4700 F 310.826.4711
www.spertuslaw.com

617 West 7th Street, Suite 200
Los Angeles, CA 90017
P 213.205.6520 F 213.205.6521

July 1, 2020

BY ECF

Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Hernan Lopez and Carlos Martinez*, No. 15-cr-252 (PKC)

Your Honor:

We represent defendants Hernan Lopez and Carlos Martinez in the above-referenced matter. Pursuant to Your Honor's Individual Practices and Rules, we write to provide the Court with the parties' proposed briefing schedule for defendants Hernan Lopez and Carlos Martinez's Motions for Severance and to Strike Certain Language in the Indictment, and to confirm service on the government via ECF. We have conferred with the government and the parties have agreed upon the following schedule:

- Notice of Motion and Motions for Severance and to Strike Language, Memorandum of Points and Authorities, and Proposed Order served on June 29, 2020;
- Opposition papers due no later than July 22, 2020; and
- Reply, if any, due no later than August 5, 2020.

Accordingly, defendants Hernan Lopez and Carlos Martinez respectfully request that the Court endorse the parties' proposed briefing schedule. We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Matthew Donald Umhofer

Matthew Donald Umhofer
James W. Spertus
Samuel A. Josephs
Counsel for Hernan Lopez

/s/ Steven J. McCool

Steven J. McCool
Julia M. Coleman
Michael T. Cornacchia
Counsel for Carlos Martinez



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cc: Counsel of record (by ECF)